Chief Magistrate Judge Theresa L. Fricke 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 MARIO CERPA, et al. Case No. 2:25-cv-00299-TLF 10 Plaintiffs, STIPULATED MOTION AND v. [PROPOSED]-ORDER FOR 11 EXTENSION OF TIME TO RESPOND MARCO RUBIO, United States Secretary of State; KRISTI NOEM, United States Secretary 12 TO COMPLAINT of Homeland Security; DAVID TYLER, Director of the National Visa Center, 13 Noted for Consideration: May 2, 2025 Defendants. 14 15 16 JOINT STIPULATION 17 The Parties, through undersigned counsel, jointly file this stipulation asking the Court to 18 extend the deadline for the filing of Defendants' Answer to Plaintiffs' Complaint until Monday, 19 June 2, 2025. 20 Plaintiffs filed their Complaint on February 14, 2025. Pursuant to LCR 12(a)(1), the 21 Defendants' response to the complaint is due on May 2, 2025. The Parties have discussed the 22 potential of resolving this matter short of further litigation and have agreed to extend the 23 deadline for 30 days. If their efforts are successful, it will save the Parties and the Court time 24 and resources. Therefore, the Parties submit there is good cause for a brief extension of STIPULATED MOTION AND [PROPOSED] ORDER FOR UNITED STATES ATTORNEY EXTENSION OF TIME TO RESPOND TO COMPLAINT 700 Stewart Street, Suite 5220 [Case No. 2:25-cv-00299-TLF] - 1 Seattle, Washington 98101-1271

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Filed 05/12/25

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206-553-7970

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1	Defendants' time to respond to the complaint and have stipulated to extend that deadline until	
2	Monday, June 2, 2025.	
3	SO STIPULATED.	
4	DATED this 2nd day of May, 2025.	
5	Respectfully submitted,	
6	TEAL LUTHY MILLER Acting United States Attorney	GLOBAL LAW ADVOCATES, PLLC
8 9 10 11 11 12	s/ Nickolas Bohl NICKOLAS BOHL, WSBA No. 48978 Assistant United States Attorney United States Attorney's Office Western District of Washington 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 Phone: 206-553-7970 Fax: 206-553-4067 Email: nickolas.bohl@usdoj.gov	s/ Inna Scott INNA SCOTT, WSBA No. 46864 655 South Orcas Street, Suite 210 Seattle, Washington 98108 Phone: 206-774-8759 Fax: 206-457-2137 Email: iscott@globallawadvocates.com Attorneys for Plaintiff
13	Attorneys for Defendants	
14 15	I certify that this memorandum contains 130 words, in compliance with the Local Civil Rules.	
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[PROPOSED]-ORDER

It is hereby ORDERED that the parties' motion is GRANTED. Defendants shall file their Answer by June 2, 2025.

DATED this 12th day of May , 2025.

TANA LIN

United States District Judge

STIPULATED MOTION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT [Case No. 2:25-cv-00299-TLF] - 3

UNITED STATES ATTORNEY 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 206-553-7970